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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

JESSICA SCHROEDER, by and through her  
guardian ad litem MARINA LANERI  
SCHROEDER

Plaintiffs,

v.

SAN DIEGO UNIFIED SCHOOL  
DISTRICT; THE BOARD OF  
EDUCATION OF THE SAN DIEGO  
UNIFIED SCHOOL DISTRICT;  
KIMBERLY CHAMBERS, individually and  
in her official capacity as a special education  
teacher for the San Diego Unified School  
District; MICHAEL JIMENEZ, individually  
and in his official capacity as a vice-principal  
for the San Diego Unified School District;  
and SUE SKINNER, individually and in her  
official capacity as a school counselor for the  
San Diego Unified School District,

Defendants.

CASE NO. 07 CV 1266 IEG (RBB)

**JOINT MOTION TO DISMISS ENTIRE  
ACTION WITH PREJUDICE**

JUDGE: HON. IRMA GONZALEZ  
CASE FILED: JULY 12, 2007  
TRIAL DATE: NOT SET

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1 Defendants, SAN DIEGO UNIFIED SCHOOL DISTRICT, KIMBERLY CHAMBERS,  
2 MICHAEL JIMENEZ, and SUE SKINNER, and Plaintiff, JESSICA SCHROEDER, by and  
3 through her guardian ad litem MARINA LANERI SCHROEDER, jointly move the Court for an  
4 order dismissing the entire action with prejudice.

5 All parties have signed a settlement agreement, and the Court has approved the  
6 settlement. Because all claims asserted throughout this lawsuit have been resolved, the parties  
7 request that the Court dismiss the entire action with prejudice.

8  
9 DATED: July \_\_, 2010

10 By: \_\_\_\_\_

11 JEFFREY L. WEEKS, ESQ..  
12 DAVID POORE, ESQ..  
13 Attorneys for Plaintiff JESSICA  
SCHROEDER, by and through her  
guardian ad litem MARINA LANERI  
SCHROEDER

14 DATED: July 13, 2010

HIGGS, FLETCHER & MACK LLP

15  
16 By:  \_\_\_\_\_

17 STEVEN J. COLOGNE, ESQ..  
18 VICTORIA E. FULLER, ESQ..  
19 Attorneys for Defendants  
20 SAN DIEGO UNIFIED SCHOOL  
DISTRICT; KIMBERLY CHAMBERS;  
MICHAEL JIMENEZ; and  
SUE SKINNER

1 Defendants, SAN DIEGO UNIFIED SCHOOL DISTRICT, KIMBERLY CHAMBERS,  
2 MICHAEL JIMENEZ, and SUE SKINNER, and Plaintiff, JESSICA SCHROEDER, by and  
3 through her guardian ad litem MARINA LANERI SCHROEDER, jointly move the Court for an  
4 order dismissing the entire action with prejudice.

5 All parties have signed a settlement agreement, and the Court has approved the  
6 settlement. Because all claims asserted throughout this lawsuit have been resolved, the parties  
7 request that the Court dismiss the entire action with prejudice.

8  
9 DATED: July \_\_, 2010

10 By: 

11 JEFFREY L. WEEKS, ESQ..  
12 DAVID POORE, ESQ..  
13 Attorneys for Plaintiff JESSICA  
SCHROEDER, by and through her  
guardian ad litem MARINA LANERI  
SCHROEDER

14 DATED: July \_\_, 2010

HIGGS, FLETCHER & MACK LLP

15  
16 By: \_\_\_\_\_

17 STEVEN J. COLOGNE, ESQ..  
18 VICTORIA E. FULLER, ESQ..  
19 Attorneys for Defendants  
20 SAN DIEGO UNIFIED SCHOOL  
DISTRICT; KIMBERLY CHAMBERS;  
MICHAEL JIMENEZ; and  
SUE SKINNER

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6 Attorneys for Defendants  
SAN DIEGO UNIFIED SCHOOL DISTRICT,  
7 THE BOARD OF EDUCATION OF THE  
SAN DIEGO UNIFIED SCHOOL DISTRICT,  
8 KIMBERLY CHAMBERS, MICHAEL JIMENEZ,  
and SUE SKINNER  
9

10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 JESSICA SCHROEDER, by and through her  
parent and guardian, Marina Laneri  
13 Schroeder,

14 Plaintiff,

15 v.

16 SAN DIEGO UNIFIED SCHOOL  
DISTRICT; THE BOARD OF  
17 EDUCATION OF THE SAN DIEGO  
UNIFIED SCHOOL DISTRICT;  
18 KIMBERLY CHAMBERS, individually and  
in her official capacity as a special education  
19 teacher for the San Diego Unified School  
District; MICHAEL JIMENEZ, individually  
20 and in his official capacity as the vice-  
principal for the San Diego Unified School  
21 District; and SUE SKINNER, individually  
and in her official capacity as a school  
22 counselor for the San Diego Unified School  
District,

23 Defendants.  
24

CASE NO. 07-CV-1266 IEG (RBB)

**PROOF OF SERVICE**

25 I am a citizen of the United States and employed in San Diego County, California. I am  
26 over the age of eighteen years and not a party to the within-entitled action. My business address  
is 401 West "A" Street, Suite 2600, San Diego, California 92101-7913.

27 On July 14, 2010, I served a true and correct copy of the within document(s):

28 **JOINT MOTION TO DISMISS ENTIRE ACTION WITH PREJUDICE**

**PROPOSED ORDER ON JOINT MOTION TO DISMISS  
ENTIRE ACTION WITH PREJUDICE**

by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

by placing the document(s) listed above in a sealed \_\_\_\_\_ envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a \_\_\_\_\_ agent for delivery. A true and correct copy of the airbill is attached hereto.

by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below **AND**  
by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below.

✓ I am familiar with the United States District Court, Southern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the Court. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the Court's transmission facilities. Under said practice, the following CM/ECF users were served.

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Telephone: 719.578.5600  
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[ginny@weeksluchetta.com](mailto:ginny@weeksluchetta.com)

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 14, 2010 at San Diego, California.

  
CELESTE L. REISING